REMARKS

Claims 1-22 are pending in this application. By this Amendment, claims 1 and 10 are amended. No new matter is added.

I.   Claim Rejections under 35 U.S.C. §103(a)

The Office Action alleges that claims 1-8, 10-17, 19, 21 and 22 are rejected under 35 U.S.C. §103(a) as unpatentable over U.S. Patent No. 6,049,339 to Schiller et al. ("Schiller"); and claims 9, 18 and 20 are rejected under 35 U.S.C. §103(a) as unpatentable over Schiller in view of U.S. Patent No. 5,731,823 to Miller et al. ("Miller"). The rejections are respectfully traversed.

Applicants assert that Schiller does not disclose each and every feature recited in rejected claims 1-8, 10-17, 19, 21 and 22. For example, Schiller does not disclose a method of processing image data of a color image for marking, the color image containing overmarked pixels where at least one first color is to be overmarked by a second color, the method comprising, *inter alia* generating information that designates the <u>overmarked pixels</u>, performing raster image processing to create a raster image of the color image, the raster image processing including <u>overmarking processing</u> that allows both the at least one first color and the second color to be separately included in the <u>overmarked pixels</u> in the same raster image and modifying image data of the overmarked pixels in the raster image to achieve undercolor reduction <u>by reducing a value corresponding to a reduced amount of an underlying marking material</u>, as recited in independent claim 1, or a system that processes image data of a color image for marking, the color image containing <u>overmarked pixels</u> where at least one first color is to be <u>overmarked by a second color</u>, as recited in independent claim 10.

In contrast, Schiller pertains to "blending operations" on objects described in a page description language (col. 1, lines 4-5). In one aspect of the invention, at least a portion of a

page description language representation of graphical objects (having transparency characteristics) is converted into a planer map representation. A planer map region is assigned a color as a function of the transparency characteristics of the graphical objects associated with the planer map region (col. 2, lines 1-7). In an image, each sample (pixel) within the image boundary (i.e., its path) has an associated color and transparency characteristic which is accounted for during the blending process (col. 3, lines 11-14). In graphical processing, a paths transparency is implemented through a technique known as blending. Blending involves combining a foreground color, associated with one path, and a background color, associated with an underlying path, to create a third color. Blending can give a path the appearance of being translucent (col. 3, lines 16-23). Blending is performed on a region-by-region basis and as a function each paths transparency characteristic (e.g., translucent or opaque), color and the specified blend mode (col. 3, lines 53-55).

Thus, as the applied reference of Schiller, actually refers to blending operations, i.e., combining a foreground color associated with one path and a background color associated with another path to create a third color, none of such blending features correspond to overmarking and overmarking pixels, as recited in the rejected claims.

The Office Action further alleges that Schiller discloses raster image processing including overmarking processing that allows both the at least one first color and the second color to be separately included in the overmarked pixels in the same raster image at col. 3, lines 66 - col. 5, line 7 of the Schiller reference. Applicants submit that Schiller merely identifies color assignments to particular paths and regions into possible planer maps corresponding to two overlapping paths (see Fig. 4). For example, Schiller discloses that in Fig. 4, if path 2 is opaque then the overlapping region 415 and the region 420 have the same color as path 2. Schiller also discloses that if the region 415 is not opaque, then the color of 415 determined by path 1, path 2 and the specified blend mode, i.e., the combination of a full

run color associated with one path and a background color associated with another path to create a third color and give the appearance of being translucent. Such blend information does not correspond to raster image processing including overmarking processing that allows both the at least one first color and the second color to be separately included in the overmarked pixels in the same raster image.

· Please note that as set forth in col. 3, lines 50-53, Schiller specifically states that "for the remainder of this description, a planer map is a collection of non-overlapping regions, that together, correspond to one or more paths." Accordingly, even if "blending information" is misinterpreted to mean "overmarking", Schiller does not disclose overmarked pixels in the same raster image. For example, because Schiller specifically states that the planer maps do not overlap, there can be no such "overmarking". Furthermore, although Schiller discloses blending, Schiller does not disclose raster image processing including overmarking processing that allows both the at least first color and the second color to be separately included in the overmarked pixels.

In other words, although Schiller may disclose blending two colors to obtain a third color giving the appearance of translucence, Schiller does not disclose overmarking at least one first color and a second color separately. Furthermore, overmarked pixels are known to those skilled in the art as pixels in which a top color, such as black, is to be marked over any combination of underlying colors such as cyan, magenta and yellow. Thus, one skilled in the art would not equate undercolor reduction to blending.

Finally, Applicants submit that even if the "blending information" disclosed in Schiller is broadly interpreted, Schiller does not disclose or suggest modifying image data of the overmarked pixels in the raster image to achieve undercolor reduction by reducing a value corresponding to a reduced amount of an underlying marking material. In other words, even if blending achieved undercolor reduction as alleged at col. 2, lines 16-32 of the Schiller

reference, Schiller does not disclose or suggest modifying image data of the overmarked

pixels in the raster image to achieve undercolor reduction by reducing a value corresponding

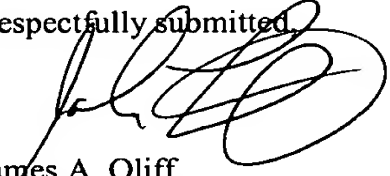to a reduced amount of underlying marking material.

Applicants further assert that claims 9, 18 and 20 are not obvious over the

combination of Schiller and Miller for at least the reasons discussed above regarding the

rejection of their independent base claims, as well as for the additional features recited

therein. Accordingly, Applicants respectfully request the rejection of claims 1-22 under 35

U.S.C. §103(a) be withdrawn.

II.   Conclusion

In view of the foregoing, it is respectfully submitted that this application is in

condition for allowance. Favorable reconsideration and prompt allowance of claims are

earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place

this application in even better condition for allowance, the Examiner is invited to contact the

undersigned at the telephone number set forth below.

Respectfully submitted,

James A. Oliff
Registration No. 27,075

John W. Fitzpatrick
Registration No. 41,018

JAO:JWF/ldg

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OLIFF & BERRIDGE, PLC
P.O. Box 19928
Alexandria, Virginia 22320
Telephone: (703) 836-6400

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